



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA :

- v. - :

: SEALED
: SUPERSEDING

INDICTMENT

DOUGLAS SHYNE, :
NATASHA SINGH, :
a/k/a "Beatris Rodrigues," :
CHRISTINE RICHARDSON, :
a/k/a "Deokali C. Richardson," :
NATHANIEL SHYNE, :
TOYBE BENNETT, :
a/k/a "Dmitriy Makarevich," :
a/k/a "Dmitriy Makervish," :
a/k/a "Eduardo Rodrigues," :
a/k/a "Cecilio Pena," :
ROBERTO MONTGOMERY, :
EPHRAIM RICHARDSON, :
NARESH PITAMBAR, :
JASON WATLER, :
STEVEN RIDDICK, and :
NATHANIEL ALEXANDER, :

S2 05 Cr. 1067 (KMK)

E/D VA.
Z:Q6mj42

Defendants. :
----- X

COUNT ONE

(Bank Fraud Conspiracy)

The Grand Jury charges:

1. From at least in or about December 2002 through in or about August 2005, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, a/k/a "Deokali C. Richardson," NATHANIEL SHYNE, TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," ROBERTO MONTGOMERY, EPHRAIM RICHARDSON, NARESH PITAMBAR,

JASON WATLER, STEVEN RIDDICK, and NATHANIEL ALEXANDER, the defendants, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, a/k/a "Deokali C. Richardson," NATHANIEL SHYNE, TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," ROBERTO MONTGOMERY, EPHRAIM RICHARDSON, NARESH PITAMBAR, JASON WATLER, STEVEN RIDDICK, and NATHANIEL ALEXANDER, the defendants, together with others known and unknown, unlawfully, willfully, and knowingly, would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, said financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, the defendants defrauded numerous banks by depositing into accounts at those banks stolen and counterfeit checks, as well as proceeds from such checks, in violation of Title 18, United States Code, Section 1344.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, a/k/a "Deokali C. Richardson," NATHANIEL SHYNE, TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," ROBERTO MONTGOMERY, EPHRAIM RICHARDSON, NARESH PITAMBAR, JASON WATLER, STEVEN RIDDICK, and NATHANIEL ALEXANDER, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

The Stolen \$775,000 Check

a. In or about March 2004, a check in the amount of approximately \$775,000 was stolen in New York, New York (the "Stolen \$775,000 Check").

b. On or about March 12, 2004, TOYBE BENNETT deposited the Stolen \$775,000 Check into a Morgan Stanley investment account at Wachovia Bank (the "Morgan Stanley Account").

c. Between on or about July 26, 2004, and on or about August 10, 2004, CHRISTINE RICHARDSON deposited into her own Citibank account approximately four checks drawn from the Morgan Stanley Account, in the total aggregate amount of approximately \$200,000.

d. Between on or about July 28, 2004, and on or about August 16, 2004, NATASHA SINGH deposited approximately four checks drawn from the Citibank account of her mother, CHRISTINE

RICHARDSON, in the total aggregate amount of approximately \$180,000, into the Bank of America (formerly Fleet) account of Douglas New York Five Star Coffee (the "Douglas Account"), a business NATASHA SINGH co-owned with DOUGLAS SHYNE.

The Victim-1 Account

e. In or about 2003, NATASHA SINGH stole the identification information of an individual who had been a client of NATASHA SINGH's when NATASHA SINGH worked as a representative at Allstate insurance company ("Victim-1").

f. In or about February 2004, an account was opened at Union Federal Bank in the name of Victim-1, using a Manhattan address (the "Victim-1 Account"), with a fraudulent wire transfer from MBNA America in the amount of approximately \$20,000.

g. On or about April 3, 2004, a check drawn from the Morgan Stanley Account in the amount of approximately \$250,000 was deposited in the Victim-1 Account.

h. From in or about March 2004 through in or about April 2004, the co-conspirators withdrew funds from the Victim-1 Account in New York, New York, among other places.

The Beatris Rodrigues Account

i. In or about 2003, NATASHA SINGH stole the identification information for an individual named Beatriz Rodriguez.

j. In or about April 2004, NATASHA SINGH applied for an unsecured loan and opened a bank account with First National Bank in Omaha, Nebraska ("First National"), under the name

"Beatris Rodrigues," using the stolen identification information of Beatriz Rodriguez (the "Rodrigues Account").

k. From on or about April 2004 through in or about May 2004, NATASHA SINGH used credit cards and checks drawn from the Rodrigues Account to pay for merchandise, women's clothing and shoes, electronic equipment and her utility bills, as well as to make payments to the Douglas Account and the Morgan Stanley Account.

The \$150,000 Counterfeit Check

l. On or about October 25, 2004, NATASHA SINGH deposited into the Douglas Account a counterfeit check in the amount of approximately \$150,000 (the "\$150,000 Counterfeit Check"), drawn on a bank account at Bank of America (formerly Fleet).

m. In the approximately two-week period following NATASHA SINGH's deposit of the \$150,000 Counterfeit Check into the Douglas Account, NATASHA SINGH largely depleted the Douglas Account, by, among other payments and withdrawals, writing approximately eight checks to herself, in the total aggregate amount of approximately \$115,000.

The \$375,000 Riddick Counterfeit Check

n. In or about late 2004 or in or about early 2005, the co-conspirators altered a check that NATASHA SINGH had received from a company called Eastern Title Agency, Inc., drawn on a Wachovia Bank account, in the amount of approximately \$55, by changing the name of the payee from NATASHA SINGH to "Steve

Riddick Sports Training Inc." and the payment amount from approximately \$55 to approximately \$375,000 (the "\$375,000 Riddick Counterfeit Check").

o. On or about April 5, 2005, DOUGLAS SHYNE sent the \$375,000 Riddick Counterfeit Check from New York, New York, by Federal Express, to an associate of STEVEN RIDDICK's ("CC-1"), in Virginia Beach, Virginia.

p. On or about April 6, 2005, STEVEN RIDDICK caused the \$375,000 Riddick Counterfeit Check to be deposited into the bank account for his business, "Steve Riddick Sports Training, Inc.," at RBC Centura Bank (the "Riddick Account").

q. On or about April 20, 2005, CHRISTINE RICHARDSON deposited into her Bank of America account a check drawn on the Riddick Account, dated April 6, 2005, in the amount of approximately \$50,000; and on or about April 25, 2005, CHRISTINE RICHARDSON issued a check drawn from her Bank of America account to Fleetway Leasing (the leasing company for a Maserati owned by NATASHA SINGH and DOUGLAS SHYNE), in the amount of approximately \$40,000.

r. On or about April 21, 2005, NARESH PITAMBAR deposited into his business's Citibank account a check drawn on the Riddick Account, dated April 6, 2005, in the amount of approximately \$20,000; and on or about May 3, 2005, NARESH PITAMBAR issued a check drawn from his Citibank account to Amechi Corp. (a company which built a fence for the residence owned by NATASHA SINGH and DOUGLAS SHYNE), in the amount of approximately

\$10,000.

s. On or about April 20, 2005, EPHRAIM RICHARDSON deposited into his JPMorgan Chase bank account a check drawn on the Riddick Account, dated April 6, 2005, in the amount of approximately \$10,000; and on or about April 29, 2005, EPHRAIM RICHARDSON issued a check drawn from his JPMorgan Chase bank account to NATASHA SINGH, in the amount of approximately \$8,500, which was deposited into NATASHA SINGH's Commerce Bank account.

t. On or about April 21, 2005, JASON WATLER deposited into his Citibank account a check drawn on the Riddick Account, dated April 6, 2005, in the amount of approximately \$80,000; and on or about April 25, 2005, JASON WATLER issued a check drawn from his Citibank account to NATASHA SINGH, in the amount of approximately \$72,400, which was deposited into NATASHA SINGH's Commerce Bank account.

u. On or about April 26, 2005, ROBERTO MONTGOMERY deposited into his JPMorgan Chase bank account a check drawn on the Riddick Account, dated April 6, 2005, in the amount of approximately \$18,000; and on or about April 27, 2005, ROBERTO MONTGOMERY issued a check drawn from his JPMorgan Chase account to New York Café Lounge, a business co-owned by NATASHA SINGH and DOUGLAS SHYNE, in the amount of approximately \$13,000.

v. On or about May 9, 2005, DOUGLAS SHYNE sent a counterfeit check in the amount of approximately \$450,000, drawn on a Wachovia Bank account (the "\$450,000 Counterfeit Check") by Federal Express, to CC-1, in Virginia Beach, Virginia.

w. On or about May 10, 2005, STEVEN RIDDICK caused the \$450,000 Counterfeit Check to be deposited into the Riddick Account.

The Two Counterfeit Checks Totaling \$1.025 Million

x. In or about April 2005, the co-conspirators altered a check that NATASHA SINGH and DOUGLAS SHYNE had received from American Express, drawn on a Wachovia Bank account, in the amount of approximately \$31.40, made out to their jointly owned business, New York Café Lounge, Inc., by changing the name of the payee from New York Café Lounge Inc. to "B&T Petroleum" and the payment amount from approximately \$31.40 to approximately \$850,000 (the "\$850,000 Counterfeit Check").

y. On or about April 26, 2005, NATHANIEL ALEXANDER caused the \$850,000 Counterfeit Check to be deposited into the bank account for his business, "B&T Petroleum," at SunTrust Bank (the "B&T Account").

z. On or about April 27, 2005, an associate of NATHANIEL ALEXANDER's ("CC-1") sent a Federal Express package from Virginia Beach, Virginia to DOUGLAS SHYNE, containing checks drawn on the B&T Account.

aa. On or about May 3, 2005, EPHRAIM RICHARDSON deposited into his JPMorgan Chase bank account a check drawn on the B&T Account, in the amount of approximately \$25,000.

bb. On or about May 3, 2005, in New York, New York, JASON WATLER deposited into his Citibank account a check drawn on the B&T Account, in the amount of approximately \$60,000.

cc. In or about June 2005, the co-conspirators altered a check that NATASHA SINGH and DOUGLAS SHYNE had received from American Express, drawn on a Wachovia Bank account, in the amount of approximately \$5.62, made out to their jointly owned business, New York Café Lounge, Inc., by changing the name of the payee from "New York Café Lounge Inc." to "Cristine Richardson" and the payment amount from approximately \$5.62 to approximately \$175,000 (the "\$175,000 Counterfeit Check").

dd. On or about July 5, 2005, CHRISTINE RICHARDSON caused the \$175,000 Counterfeit Check to be deposited into her Bank of America account.

The Victim-2 Account and the \$228,997 Counterfeit Check

ee. In or about May 2005, the co-conspirators opened an account at Union Federal Bank in the name of an individual whose identification information they had stolen ("Victim-2"), using TOYBE BENNETT's address (the "Victim-2 Account").

ff. On or about June 2, 2005, a counterfeit check in the amount of approximately \$228,997 was deposited in the Victim-2 Account.

gg. From in or about May 2005 through in or about June 2005, a debit card using funds from the Victim-2 Account was used in New York, New York, among other places.

The \$375,000 Auto Group Counterfeit Check

hh. In or about May 2005, the co-conspirators altered a check that NATASHA SINGH and DOUGLAS SHYNE had received from Camden County College, drawn on a Bank of America account, in the

amount of approximately \$99, made out to NATASHA SINGH's young daughter, by changing the name of the payee from NATASHA SINGH's daughter's to "Auto Group Carriers & RVs" and the payment amount from approximately \$99 to approximately \$375,000 (the "\$375,000 Auto Group Counterfeit Check").

ii. On or about July 22, 2005, a co-conspirator not named as a defendant herein ("CC-2") caused the \$375,000 Auto Group Counterfeit Check to be deposited into CC-2's account at Commerce Bank.

The \$180,000 Counterfeit Check

jj. On or about June 8, 2005, a counterfeit check for approximately \$180,000, drawn on an account at [], was deposited into the Commerce Bank account of NATHANIEL SHYNE, located in New York, New York.

kk. On or about June 9, 2005, NATHANIEL SHYNE issued approximately two checks drawn from his Commerce Bank account to CHRISTINE RICHARDSON in the total aggregate amount of approximately \$135,000, which checks were deposited into CHRISTINE RICHARDSON's bank accounts at Citibank and Bank of America.

The Victim-3 Account and the \$75,000 Counterfeit Check

ll. Prior to in or about 2004, in Orange County, New York, the co-conspirators stole the identification information of a resident of Newburgh, New York ("Victim-3").

mm. From at least in or about 2004, the co-conspirators used Victim-3's identification information to

purchase and to attempt to purchase merchandise, including computers, women's clothing, children's clothing and toys, in Orange County and New York, New York, among other places.

nn. In or about June 2005, an account was opened at Union Federal Bank in Victim-3's name, using a Philadelphia address frequently used by the co-conspirators (the "Victim-3 Account").

oo. On or about June 24, 2005, a counterfeit check in the amount of approximately \$75,000, drawn on a Bank of America account, was deposited into the Citizen's Bank account of a co-conspirator not named as a defendant herein (the "CC-3 Account").

pp. On or about June 24, 2005, a check for approximately \$6,000 drawn from the CC-3 Account was deposited into the Victim-3 Account.

qq. On or about June 27, 2005, CHRISTINE RICHARDSON caused to be deposited into her Bank of America account a check drawn from the CC-3 Account in the amount of approximately \$49,000.

rr. Between on or about June 26, 2005 and on or about June 27, 2005, CHRISTINE RICHARDSON issued approximately two checks drawn from her Bank of America account to NATASHA SINGH in the amounts of approximately \$8,200 and \$9,100.

ss. Between on or about June 27, 2005 and on or about June 28, 2005, CHRISTINE RICHARDSON issued approximately three checks drawn from her Bank of America account to EPHRAIM

RICHARDSON in the amounts of approximately \$2,500, \$4,300, and \$4,700.

tt. Between on or about June 27, 2005 and on or about June 28, 2005, CHRISTINE RICHARDSON issued three checks to cash in the amounts of approximately \$8,500, \$8,000, and \$7,350.

The Two Counterfeit Checks Totaling \$153,000

uu. On or about July 25, 2005, a co-conspirator not named as a defendant herein ("CC-4") deposited into CC-4's Bank of America account (the "CC-4 Account") approximately two counterfeit checks in the total aggregate amount of approximately \$153,000, drawn on accounts at [].

vv. In or about August 2005, CC-4 issued approximately six checks drawn from the CC-4 Account to New York Café Lounge, a business co-owned by NATASHA SINGH and DOUGLAS SHYNE, in the total aggregate amount of approximately \$73,500.

ww. In or about August 2005, CC-4 issued approximately three checks drawn from the CC-4 Account to NATHANIEL SHYNE, in the total aggregate amount of approximately \$21,550, which were deposited into NATHANIEL SHYNE's Commerce Bank account, located in New York, New York.

(Title 18, United States Code, Section 1349.)

COUNTS TWO THROUGH EIGHT

(Bank Fraud)

The Grand Jury further charges:

4. The allegations set forth in paragraph 3 are repeated and realleged as if set forth fully herein.

5. On the approximate dates set forth below, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, a/k/a "Deokali C. Richardson," NATHANIEL SHYNE, TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," ROBERTO MONTGOMERY, EPHRAIM RICHARDSON, NARESH PITAMBAR, JASON WATLER, STEVEN RIDDICK, and NATHANIEL ALEXANDER, the defendants, unlawfully, willfully, and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of such financial institution, by means of false and fraudulent pretenses, representations and promises, to wit, the defendants defrauded numerous banks, as set forth below, by depositing stolen and counterfeit checks and proceeds from such checks into accounts at such banks, as set forth below.

COUNT	Approx. Dates	Approx. Check Amt.	Bank*	Defendant(s)**
-------	------------------	-----------------------	-------	----------------

*The bank listed is the FDIC-insured financial institution on which the corresponding check is drawn.

**The defendants' aliases listed in the caption of this Indictment apply to Counts Two through Eight.

TWO	3/04-8/04	\$775,000 stolen check	Wachovia Bank	DOUGLAS SHYNE, NATASHA SINGH, CHRISTINE RICHARDSON, TOYBE BENNETT
THREE	10/04-12/04	\$150,000***	Bank of America	NATASHA SINGH
FOUR	12/04-5/05	Two checks totaling \$825,000	Wachovia Bank	DOUGLAS SHYNE, NATASHA SINGH, CHRISTINE RICHARDSON, ROBERTO MONTGOMERY, EPHRAIM RICHARDSON, NARESH PITAMBER, JASON WATLER, STEVEN RIDDICK
FIVE	4/05-7/05	Two checks totaling \$1.025 million	Wachovia Bank	DOUGLAS SHYNE, NATASHA SINGH, CHRISTINE RICHARDSON, EPHRAIM RICHARDSON, JASON WATLER, NATHANIEL ALEXANDER
SIX	5/05-7/05	\$375,000	Bank of America	DOUGLAS SHYNE, NATASHA SINGH

***Unless otherwise noted, the checks listed are counterfeit.

SEVEN	6/05	\$180,000	[[[]]]	DOUGLAS SHYNE, NATASHA SINGH, CHRISTINE RICHARDSON, NATHANIEL SHYNE
EIGHT	7/05-8/05	Two checks totaling \$153,000	[[[]]]	DOUGLAS SHYNE, NATASHA SINGH, CHRISTINE RICHARDSON, NATHANIEL SHYNE

(Title 18, United States Code, Sections 1344 and 2.)

COUNT NINE

(Money Laundering Conspiracy)

The Grand Jury further charges:

6. From at least in or about 2004 through in or about August 2005, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, a/k/a "Deokali C. Richardson," and TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).

7. It was a part and an object of the conspiracy that in or about 2004 through in or about August 2005, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH,

a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, a/k/a "Deokali C. Richardson," and TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions, which in fact involved proceeds of specified unlawful activity, to wit, bank fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

OVERT ACTS

8. In furtherance of the conspiracy and to effect the illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, a/k/a "Deokali C. Richardson," and TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about March 2004, a check in the amount of approximately \$775,000 was stolen in New York, New York (the "Stolen \$775,000 Check").

b. On or about March 12, 2004, TOYBE BENNETT deposited the Stolen \$775,000 Check into a Morgan Stanley investment account at Wachovia Bank (the "Morgan Stanley Account").

c. From on or about July 26, 2004, through on or about August 10, 2004, approximately four checks, totaling approximately \$200,000, drawn from the Morgan Stanley Account opened by TOYBE BENNETT, were deposited into the Citibank account of CHRISTINE RICHARDSON.

d. From on or about July 28, 2004, through on or about August 16, 2004, approximately four checks, totaling approximately \$180,000, drawn from the Citibank account of CHRISTINE RICHARDSON, were deposited into the Bank of America (formerly Fleet) account of Douglas New York Five Star Coffee, a business NATASHA SINGH co-owned with DOUGLAS SHYNE.

(Title 18, United States Code, Section 1956(h).)

COUNT TEN

(Money Laundering Conspiracy)

The Grand Jury further charges:

9. From at least in or about June 2005 through in or about August 2005, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, a/k/a "Deokali C. Richardson," and NATHANIEL SHYNE, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate

Title 18, United States Code, Section 1956(a)(1)(B)(i).

10. It was a part and an object of the conspiracy that in or about June 2005 through in or about August 2005, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, a/k/a "Deokali C. Richardson," and NATHANIEL SHYNE, the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions, which in fact involved proceeds of specified unlawful activity, to wit, bank fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

OVERT ACTS

11. In furtherance of the conspiracy and to effect the illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, a/k/a "Deokali C. Richardson," and NATHANIEL SHYNE, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about June 8, 2005, a counterfeit check for

approximately \$180,000 was deposited into the Commerce Bank account of NATHANIEL SHYNE, located in New York, New York.

b. On or about June 9, 2005, NATHANIEL SHYNE issued approximately two checks drawn from his Commerce Bank account to CHRISTINE RICHARDSON, in the total aggregate amount of approximately \$135,000.

c. On or about July 25, 2005, a co-conspirator not named as a defendant herein ("CC-4") deposited into CC-1's Bank of America account (the "CC-4 Account") approximately two counterfeit checks in the total aggregate amount of approximately \$153,000.

d. In or about August 2005, CC-4 issued approximately six checks drawn from the CC-4 Account to a business co-owned by NATASHA SINGH and DOUGLAS SHYNE, in the total aggregate amount of approximately \$73,500.

e. In or about August 2005, CC-4 issued approximately three checks drawn from the CC-1 Account to NATHANIEL SHYNE, in the total aggregate amount of approximately \$21,550.

(Title 18, United States Code, Section 1956(h).)

COUNT TWELVE

(Stolen Goods Conspiracy)

The Grand Jury further charges:

12. In or about November 2004, in the Southern District of New York and elsewhere, TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," and ROBERTO MONTGOMERY, the

defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Section 2315.

13. It was a part and an object of the conspiracy that TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," and ROBERTO MONTGOMERY, the defendants, and others known and unknown, unlawfully, willfully, and knowingly, would and did receive, possess, conceal, store, barter, sell and dispose of goods, wares, merchandise, securities, and money of the value of \$5,000 and more, which have crossed a State boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, to wit, TOYBE BENNETT, ROBERTO MONTGOMERY, and others used a counterfeit check to purchase at least approximately three vehicles in Florida, which subsequently were brought to New York, in violation of Title 18, United States Code, Section 2315.

OVERT ACTS

14. In furtherance of the conspiracy and to effect the illegal object thereof, TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," and ROBERTO MONTGOMERY, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about November 2004, TOYBE BENNETT sent a counterfeit check in the amount of approximately \$277,000 to Euro Motor Sports in Fort Lauderdale, Florida for the purchase of approximately three vehicles.

b. In or about November 2004, ROBERTO MONTGOMERY picked up one of the vehicles at Euro Motor Sports that had been purchased with the counterfeit \$277,000 check.

c. In or about November 2004, at least one of the vehicles purchased with the counterfeit check was brought to New York, New York.

(Title 18, United States Code, Section 371.)

COUNT THIRTEEN

(Naturalization Fraud)

The Grand Jury further charges:

15. From on or about June 20, 1994, up to and including on or about May 21, 2004, in the Southern District of New York and elsewhere, NATASHA SINGH, the defendant, unlawfully, willfully, and knowingly did procure and attempt to procure, contrary to law, the naturalization of a person, and documentary and other evidence of naturalization and of citizenship, to wit, in a Form N-400 (Application for Naturalization) filed by NATASHA SINGH on or about April 20, 2004 with the agency then known as the Immigration and Naturalization Service (now known as the U.S. Citizenship and Immigration Services), NATASHA SINGH claimed that she had never committed a crime or offense for which she had not been arrested and that she had worked full-time for Allstate

Insurance from in or about 1992 through on or about April 20, 2004, whereas in fact, she had committed numerous offenses, as charged in Count One and Three through Twelve herein, and she had been terminated from Allstate Insurance before in or about 2003.

(Title 18, United States Code, Section 1425(a).)

COUNT FOURTEEN

(Bank Fraud)

The Grand Jury further charges:

16. From at least on or about June 29, 2000, through on or about July 26, 2000, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of such financial institution, by means of false and fraudulent pretenses, representations and promises, to wit, DOUGLAS SHYNE defrauded JPMorgan Chase Bank (formerly Chase Manhattan Bank), among other banks, by causing stolen checks drawn on Chase and other accounts to be deposited into brokerage accounts established by DOUGLAS SHYNE and others in New York, New York for the purpose of withdrawing the money and laundering it through accounts and corporations controlled by DOUGLAS SHYNE.

(Title 18, United States Code, Sections 1344 and 2.)

FORFEITURE ALLEGATION

17. As a result of committing one or more of the foregoing offenses alleged in Count One of this Indictment, DOUGLAS SHYNE and NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendants, shall forfeit to the United States pursuant to 18 U.S.C. § 982, any property constituting or derived from proceeds obtained directly or indirectly as a result of the fraud offenses, including but not limited to all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 708 Meade Court, Williamstown, NJ 08094.

Substitute Assets Provision

18. If the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1344.)

FOREPERSON

MICHAEL J. GARCIA
United States Attorney